

Questions and Answers: Youth and Summer 2000 Program Guidance

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These questions and answers are not official policy, so please note that when official policies are posted, they will automatically take precedence over this guidance. Any changes to these answers or the addition of new questions will be highlighted in red and/or dated.

If you have any questions regarding the application of a question or answer to your particular circumstances, please contact Joe Holicky at the Virginia Employment Commission, WIA Unit, at 804-225-2194 or jholicky@vec.state.va.us.

SUMMER YOUTH UNDER WIA

What is the difference between a Summer Youth Program (JTPA) and a summer activity for youth (WIA)?

The Summer Youth Program under the Job Training Partnership Act (JTPA) was a standalone program with its own separate funding stream. The program lasted approximately six weeks and when the program was over the participants may or may not have continued participation in the year round youth program.

Now, under WIA, the summer activity is just one of ten activities that are part of a comprehensive youth program design. To determine what service mix is appropriate for youth participating in WIA programs, an objective assessment must be completed for each youth. The results of the objective assessment must be documented in an individual service strategy that in turn describes the services needed by the youth. A youth may be enrolled in only one activity (i.e., summer activity), if this is determined to be appropriate based on the objective assessment and individual service strategy outcomes. If a youth is enrolled in only one activity (i.e., summer activity) the required follow-up services must be provided for one year. Youth programs under WIA have performance standards that include the outcomes for youth who participate in the summer activity.

Additionally, for WIA there is the requirement that 30 percent of all youth funds be spent on out-of-school youth. There is less money available for WIA youth activities and they must be spent for year around activities

Is there a separate pot of money for summer youth activities under WIA like there was under JTPA?

No, the summer program is just one of ten required activities that must be offered to youth by the local workforce investment programs.

Can private sector funds be used in concert with WIA funds for summer activities?

Yes. WIA should not be seen as a single funding stream for all these programs at the local level. Local Workforce Investment Boards (LWIBs) should seek out all available sources of funds to enhance the scope of the local program. In addition to private sector funds, LWIBs should look to a variety of funding sources; for example, local Temporary Assistance to Needy Families (TANF) funds may be used to support part of the summer youth activities.

Is there a minimum or maximum amount that can be spent by local areas for summer activities?

Local boards determine how much of available WIA youth funds will be used for summer and for year-round youth activities. There is less money available for summer youth activities since WIA funds must be spent across all of the year round activities.

Are there other possible funding sources for summer youth activities?

Yes. As mentioned above, LWIBs should look to other sources within their respective areas to develop relationships with community organizations that may provide supplemental funding for the Summer Program. USDOL and USHHS have sent letters to the Governors' encouraging the use of TANF funds to enhance this year's summer activities for youth.

If our Local Workforce Investment Board (LWIB) has not been certified, can we run a summer program?

No, local areas must have a certified board, a Youth Council and must submit a "Local Interim Abbreviated Plan for the Provision of Workforce Investment Act (WIA) Youth Programs and Activities." Once the plan is submitted and approved, local areas may begin to develop and implement summer activities in their respective areas.

If my LWIA receives the 25% youth activity funds (WIA funds available for the period 4/1/2000 through 6/30/2000), what can they be used for?

The 25% youth activity funds can be used to provide services to youth that will support the purposes outlined for youth activities under the Workforce Investment Act. The summer youth activities must be seen as a part of a comprehensive youth strategy in the local workforce investment area that responds to the purpose of youth programs.

Is a local plan necessary before an area can run a summer program?

Yes. Areas wishing to expend WIA funds prior to July 1st must submit an Abbreviated Youth Plan using the guidance that has been posted on the WIA website (<http://vec.state.va.us/wia.htm>) Otherwise, the required youth elements for the local area must be incorporated into the overall strategic local plan that is submitted by the LWIB. Such planning is necessary for the State to determine how the local areas intend to address the year round needs of youth in their respective areas. The plan is a critical part of the relationship that is evolving between the Virginia Employment Commission and the seventeen local workforce investment areas (LWIAs).

My area has JTPA carryover funds from Title II-B. Can JTPA funds be used along with WIA funds for the summer program?

JTPA funds can only be used through 6/30/2000. On July 1, 2000 unexpended JTPA funds (this excludes all JTPA funds earmarked for JTPA closeout) become WIA funds and are subject to WIA rules and regulations.

However, the LWIB needs to develop an agreement with the existing JTPA entity to ensure a smooth transition from the JTPA program to WIA. There should be joint planning of these programs at the local level to ensure continuity of programs and seamless services for JTPA participants that will transition into WIA.

Can the LWIB design a summer activity to target a specific youth group, for example, younger youth ages 14-17?

Targeting eligible younger or older youth is at the discretion of the LWIB, upon recommendation of the local Youth Council. The program design must incorporate the ten elements required by the Act. Additionally, LWIBs and Youth Councils should establish a program that engages out-of-school youth.

Are local Youth Councils required to submit a plan for the calendar year 2000 summer youth activities?

Yes. Local Youth Councils are required to submit a board approved plan describing how they will plan and operate the summer activities for calendar year 2000.

YEAR ROUND YOUTH PROGRAM REQUIREMENTS

Each local workforce board is required to submit a local plan describing how local programs will be designed to meet a year round framework with ten required program elements. These plans must address funds distribution for the year-round and summer youth activities within the local areas to meet required youth requirements. In addition, there is a requirement to target 30% of WIA youth funds to out of school youth.

What is the purpose of WIA youth programs?

The purpose of WIA youth programs is to assist eligible youth achieve academic and employment success by providing:

- Effective and comprehensive activities, including a variety of options for improving educational and skills competencies and effective connections to employers;
- Ongoing mentoring opportunities with adults committed to providing such opportunities;
- Opportunities for training;
- Continued supportive services;
- Incentives for recognition and achievement; and,
- Opportunities and activities related to leadership development, decision-making, citizenship, and community service.

How must local youth programs be designed?

The design framework of local youth programs must:

- Provide an objective assessment of the academic levels, skill levels, and service needs of each participant.

This assessment shall include a review of basic skills, occupational skills, prior work experience, employability, interests, aptitudes (including interests and aptitudes for nontraditional jobs), supportive service needs, and developmental needs of such participant, except that a new

assessment of a participant is not required if the provider carrying out such a program determines it is appropriate to use a recent assessment of the participant conducted as part of another education or training program; and includes a review of the academic as well as the services needs, of each youth.

- Develop the necessary service strategies appropriate for each participant that identifies an employment goal (including participation in nontraditional employment opportunities), achievement objectives, and services for the participant utilizing the results of an objective assessment process, except that a new service strategy for a participant is not required if the provider carrying out such a program determines it is appropriate to use a recent service strategy developed for the participant under another education or training program; and

- Provide—

preparation for postsecondary educational opportunities, in appropriate cases;

strong linkages between academic and occupational learning;

preparation for unsubsidized employment opportunities, in appropriate cases; and

effective connections to intermediaries with strong links to the job market, and local and regional employers.

You mention 10 program elements, what are they?

- 1) Tutoring, study skills training, and instruction, leading to completion of secondary school, including dropout prevention strategies;
- 2) Alternative secondary school services;
- 3) Summer employment opportunities that are directly linked to academic and occupational learning;
- 4) Paid and unpaid work experiences, including internships and job shadowing;
- 5) Occupational skill training;
- 6) Leadership development opportunities, which may include community service and peer-centered activities encouraging responsibility and other positive social behaviors during non-school hours;

- 7) Supportive services;
- 8) Adult mentoring for the period of participation and a subsequent period, for a total of not less than 12 months;
- 9) Follow-up services for not less than 12 months after the completion of participation, as appropriate; and
- 10) Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling and referral, as appropriate.

Does every youth have to receive all ten of the program elements?

No, the required ten program elements must be available to the youth in each local workforce area; however, the services provided to each youth must meet that individual's needs and be based on the results of an objective assessment and individual service strategy.

What are follow-up services?

All youth participants must receive some sort of follow-up services for a minimum of 12 months. Follow-up services may be provided beyond twelve (12) months at the State or Local Board's discretion. The types of services provided and the duration of services must be determined based on the needs of the individual. The scope of these follow-up services may be less intensive for youth who have only participated in summer youth employment activities.

Follow-up services include

- Leadership and supportive service activities
- Regular contact with a youth participant's employer, including assistance in addressing work-related problems that arise;
- Assistance in securing better paying jobs, career development and further education;
- Work-related peer support groups;
- Adult mentoring; and
- Tracking the progress of youth employment after training.

What do you mean by leadership?

Leadership activities include:

- Exposure to postsecondary educational opportunities;
- Community and service learning projects;
- Peer-centered activities, including peer mentoring and tutoring;
- Organizational and teamwork training, including team leadership training;
- Training in decision-making, including determining priorities;

- Citizenship training including life skills training such as parenting, work behavior training, and budgeting of resources;
- Employability; and
- Positive social behaviors.

What exactly do you mean by “positive social behaviors”?

This refers to “soft skills” training which may include such things as positive attitudinal development, self-esteem building, cultural diversity training, and work simulation activities.

What kind of supportive services can be provided as follow-up services?

- Linkages to community services;
- Assistance with transportation;
- Assistance with child care and dependent care costs;
- Assistance with housing costs;
- Referrals to medical services; and
- Assistance with uniforms or other appropriate work attire and work-related tools costs, including such items as eyeglasses and protective eye gear.

Are there any additional requirements for the youth program?

Yes, each participant or applicant who meets the minimum income criteria is to be provided with information on the full array of services available in that community, especially from those providers receiving funds under this subtitle, as well as referral to appropriate training and educational programs.

What about youth that are not eligible?

Applicants who do not meet the enrollment requirements of a particular program or who cannot be served shall be referred for further assessment, as necessary, and referred to appropriate programs in the community to meet the basic skills and training needs of the applicant.

Are local boards required to offer summer employment opportunities in the local youth program?

Yes. Local boards are required to offer summer youth employment opportunities that link academic and occupational learning as part of the required menu of services that include the required ten program elements.

Summer youth employment must provide direct linkages to academic and occupational learning, and may provide other elements and strategies as appropriate to serve the needs and goals of the participants.

The summer youth employment opportunities element is not intended to be a stand-alone program. Local programs should integrate a youth's participation in that element into a comprehensive strategy for addressing the youth's employment and training needs. Youths who participate in summer employment opportunities must be provided with a minimum of twelve months of follow-up services.

What is the role of the local workforce investment boards in providing services to youth?

The local board for each area shall identify eligible providers of youth activities by ***awarding grants or contracts on a competitive basis***, based on the recommendations of the Youth Council and on the criteria contained in the state plan. The local boards also conduct oversight to the providers of youth programs.

Do the core performance measures apply to participation in the summer employment activities?

Yes. The summer employment opportunity element is one of a number of activities authorized by the WIA youth program. The law provides specific core indicators of performance youth, and requires that all participating youth be included in a determination of whether the local levels of performance are met. Program operators can help ensure positive outcomes for youth participants by providing them with continuity of services.

TRANSITION TO WIA

What happens to JTPA participants who are continuing services after June 30, 2000?

On July 1, 2000, Job Training Partnership Act funds become Workforce Investment Act funds. Participants who are continuing services after June 30, 2000 must be grandfathered into WIA. This means that follow-up activities are required for these participants who will be included in performance measures under WIA. These participants can complete services specified in their individual service strategies (ISS), even if that service strategy is not allowable under WIA, or if the participant is not eligible to receive these services under WIA.

If services are completed prior to July 1, 2000, these participants will not be considered WIA participants. Local areas are reminded that terminating participants on or before June 30th to avoid WIA requirements is not a productive alternative for youth who have not completed their ISS plan, because future services needed by such a participant likely will require re-enrollment under WIA.

The choice to prematurely terminate services to a youth in need is contrary to the intent and goals of the legislation.

See the “Q & A on Transition” for a further explanation and guidance on the transition activities and requirements.

ELIGIBILITY ISSUES AND DEFINITIONS

Who is eligible for summer youth services?

An “eligible youth “ means an individual who:

- Is not less than 14 and not more than age 21;
- Is a low income individual; and
- Is an individual who is one or more of the following:
 - Deficient in basic literacy skills
 - A school dropout
 - Homeless, a runaway, or a foster child
 - Pregnant or parent
 - An offender
 - An individual who requires additional assistance to complete an educational program, or to secure and hold employment.

What do you mean by 5% Window?

Not more than 5 percent in each local area may be individuals who do not meet the minimum income criteria to be considered eligible youth, if such individuals are within one or more of the following categories:

- Individuals who are school dropouts
- Individuals who are basic skills deficient
- Individuals with educational attainment that is one or more grade levels below the grade level appropriate to age of the individuals.
- Individuals who are pregnant or parenting

- Individuals with disabilities, including learning disabilities
- Individuals who are homeless or runaway youth
- Individuals who are offenders
- Other eligible youth who face serious barriers to employment as identified by the local board.

Are there any other eligibility requirements for youth?

Yes, compliance with the Military Selective Service Act: Registration information and request for an advisory opinion must be documented for all males who were born on or after January 1, 1960, who are 18 years of age or older.

Also, a youth must be able to work in the United States to be able to register for WIA services.

Who is “out-of-school youth”?

An out-of-school youth is an individual who:

- Is an eligible youth who is a school dropout; or
- Is an eligible youth who has either graduated from high school or holds a GED, but is basic skills deficient, unemployed, or underemployed.

Is a youth that attends an alternative school considered a “dropout”?

No. A school dropout is defined as an individual who is no longer attending any school and who has not received a secondary school diploma or its recognized equivalent. A youth attending an alternative school is not a dropout.

May a local program use the eligibility for free lunches under the National School Lunch Program as a substitute for the income eligibility criteria under Title I of WIA?

No. The criteria for income eligibility under the National School Lunch Program are not the same as the WIAs income eligibility criteria. Therefore, the school lunch list may not be used as a substitute for income eligibility to determine who is eligible for services under the Act.

What is the definition of a low-income individual under WIA?

The term “low income individual” means an individual who –

Received an income or is a member of a family that received a total family income, for the 6-month period prior to application for the program involved (exclusive of unemployment compensation, child support payments, cash payments under a Federal, State or local income-based public assistance program; and old-age and survivors insurance benefits received under section 202 of the Social Security Act (42 U.S.C. 402)) that, in relation to family size, does not exceed the higher of—

the poverty line, for an equivalent period; or

70 percent of the lower living standard income level, for an equivalent period; or

meets the income eligibility criteria for cash payments made under any Federal, State or local public assistance program.

May a disabled youth whose family does not meet income eligibility criteria under the Act be eligible for youth services?

Yes. Even if the family of a disabled youth does not meet the income criteria, the disabled youth is considered a low-income individual if the youth's own income meets the guidelines for a low-income individual.

What is “basic skills deficient”?

The term “basic skills deficient” means, with respect to an individual, that the individual has English reading, writing, or computing skills at or below the 8th grade level on a generally accepted standardized test or a comparable score on a criterion-referenced test.

What is an “offender”?

The term “offender” means any youth who

Is or has been subject to any stage of the criminal justice process, for whom services under the Act may be beneficial; or

Requires assistance in overcoming artificial barriers to employment resulting from a record of arrest or conviction.

What is a “participant”?

The term “participant” means an individual has been determined to be eligible to participate in and who is receiving services (except follow-up services...) under a program authorized by this title.

Participation shall be deemed to commence on the first day, following determination of eligibility, on which the individual began receiving subsidized employment, training or other services provided under this title.

What is an “older youth”?

The term “older youth” means an individual who is 19 or older but less than 22 on the date of application.

What is a “younger youth”?

The term “younger youth” means an individual who is 14 or older but less than 19 on the date of application.

What is a “family” for WIA eligibility purposes?

The term “family” means two or more person related by blood, marriage or decree of court, who are living in a single residence, and are included in one or more of the following categories:

A husband, wife, and dependent children

A parent or guardian and dependent children

A husband and wife.

What is “family income”?

Family income is the income received from included sources of income for all members of the “family,” as defined above. Family income means “income” as defined by the Department of Health and Human Services in connection with the annual poverty guidelines with the exceptions noted under “Exclusions to Family Income.”

Self employed income is to be determined on the basis of the most recently submitted federal income tax return or on the basis of annualized proceeds posted in more up-to-date acceptable accounting records. All other income is to be annualized based on receipts during the past six months.

Family size shall be the maximum number of family members during the income determination period. For a separated or divorced applicant, income shall be prorated depending on the length of time during the last six month the applicant lived with the other wage earner.